

**IRA HELLER LAW, LLC**  
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**Union, New Jersey 07083**  
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**Attorney(s) for Betty Sebrow**

X

[REDACTED]  
Plaintiff,

-vs-

**BETTY SEBROW,**

Defendant.

**SUPERIOR COURT OF NEW JERSEY**  
**CHANCERY DIVISION**  
**FAMILY PART - ESSEX COUNTY**

**DOCKET NO.: FV-07000-265-22X**

**CIVIL ACTION**

**BETTY SEBROW,**

Plaintiff,

-vs-

[REDACTED],

Defendant.

X

**DOCKET NO.: FV-07-000487-22**

**CIVIL ACTION**

**NOTICE OF MOTION TO WITHDRAW  
AS LEGAL COUNSEL**

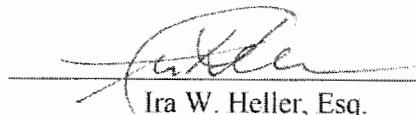
**PLEASE TAKE NOTICE** that on the \_\_\_\_\_ day of \_\_\_\_\_, 2025, at \_\_\_\_\_ am/pm, or as soon thereafter as counsel can be heard, the undersigned, Law Offices of Ira Heller Law, LLC, attorneys for Betty Sebrow., shall move before the Superior Court of New Jersey, Essex County, Chancery Division, Family Part, at the 465 Dr Martin Luther King Blvd, Newark, New Jersey for an Order as follows:

1. Granting counsel leave to withdraw from representation in the above-captioned matter; and
2. Granting leave of the Court to provide reasonable opportunity for Litigant Betty Sebrow to retain new counsel to represent her in this ongoing matter; and
3. Granting any other reliefs the Court may deem necessary and proper.

**PLEASE TAKE FURTHER NOTICE** that in support of this application counsel shall rely upon the information provided in the documents annexed hereto. A proposed form of Order is attached.

**PLEASE TAKE FURTHER NOTICE** that pursuant to R. 1:6-2, the Plaintiff hereby requests oral argument only if this matter is opposed or as the Court deems necessary and proper.

Dated: January 20, 2025



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Ira W. Heller, Esq.

**NOTICE TO LITIGANTS PURSUANT TO RULE 5:5-4(c)**

NOTICE TO LITIGANTS: IF YOU WANT TO RESPOND TO THIS MOTION YOU MUST DO SO IN WRITING. This written response shall be by affidavit or certification. (Affidavits and certifications are documents filed with the Court. In either document the person signing it swears to its truth and acknowledges that they are aware that they can be punished for not filing a true statement with the Court. Affidavits are notarized and certifications are not). If you would also like to submit your own separate requests in a motion to the judge you can do so by filing a cross-motion. Your response and/or cross-motion may ask for oral argument. That means you can ask to appear before the Court to explain your position. However, you must submit a written response even if you request oral argument. Any papers you send to the Court must be sent to the opposing side, either to the attorney if the opposing party is represented by one, or to the other party if they represent themselves. Two copies of all Motions, Cross Motions, Certifications and Briefs shall be sent to the opposing side.

The response and/or cross-motion must be submitted to the Court by a certain date. All motions must be filed on the Tuesday 24 days before the return date. A response and/or cross motion must be filed fifteen days (Thursday) before the return date. Answers or responses to any opposing affidavits and cross-motions shall be served and filed together not later than eight days (Thursday) before the return date. No other response is permitted without permission of the court. If you mail in your papers you must add three days to the above time periods. Two copies of all motions, cross-motions, certifications, and briefs shall be served.

Response to motion papers sent to the court are to be sent to the following address: Clerk, Superior Court of New Jersey, Essex County Family Division, Wilentz Justice Center, 212 Washington Street, Newark, NJ. Call the Family Division Manager's office at (973) 776-9300. If you have any questions on how to file a motion, cross-motion or any response papers. Please note that the Family Division Manager's office cannot give you legal advice.

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**BETTY SEBROW,**

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[REDACTED]  
Defendant.

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**CERTIFICATION OF ATTORNEY IN  
SUPPORT OF MOTION TO WITHDRAW  
AS LEGAL COUNSEL**

I, IRA W. HELLER, ESQ., of full age, hereby certify as follows:

1. I have been legal counsel to Ms. Betty Sebrow undersigned has been representing the Defendant in this matter since July of 2021.
2. Since February of 2022, Ms. Sebrow has been unable to fulfill her financial obligations under the terms of the Attorney-Client Retainer Agreement.
3. My law firm is a solo practice and can no longer bear the financial burden of providing legal services without compensation in this matter.

4. I have provided reasonable notice to Ms. Sebrow that unless legal fees would be paid, that the undersigned would no longer be able to continue his representation in this matter.

5. Despite the Ms. Sebrow's good faith efforts to resolve the outstanding payment issues, she unfortunately remains unable to make the required payments.

6. Counsel in this matter has experienced significant financial hardship in continuing to represent Ms. Sebrow without compensation for approximately two and a half years. As this matter has progressed, this hardship has become increasingly burdensome, significantly affecting counsel's ability to provide effective legal representation to Ms. Sebrow.

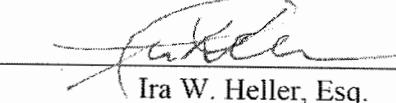
7. Ms. Sebrow has been provided with adequate notice of the impending filing of this Motion to Withdraw from these proceedings. She is actively in the process of retaining new counsel to represent her as this matter progresses.

8. The extensive and ongoing investment of time and resources required to continue in this matter has imposed an unreasonable financial burden and hardship, which has significantly impaired my ability to provide effective and proper legal representation to my client as this case progresses.

9. Counsel has provided full cooperation to Ms. Sebrow to facilitate the smooth transition of her case to new counsel.

I hereby certify that the foregoing statements made by me are true and accurate. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Date: January 20, 2025



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Ira W. Heller, Esq.

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***PROPOSED ORDER***

[REDACTED]  
Defendant.

X

**THIS MATTER** having been opened to the Court by way of Notice of Motion having been filed by, Ira Heller Law, LLC, with Ira W. Heller, Esq., appearing as counsel to Ms. Betty Sebrow, and notice having been provided to Ms. Sebrow and to Counsel for the opposing litigant, [REDACTED]

[REDACTED] via his counsel Borenstein, McConnell & Calpin, P.C., with Abraham Borenstein appearing, and the Court having considered the papers submitted, and for good cause having been shown;

1. Counsel is hereby granted leave to withdraw from representation in the above-captioned matter; and
2. The Court shall hereby provide Betty Sebrow with reasonable time to retain new counsel to represent her in this ongoing matter; and

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HON. JOSHUA D. SANDERS, J.S.C.